

Appendix B to the Declaration of E. Evans Wohlforth, Esq.

Document Title/ECF No.	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought is Not Available	Any Prior Order Sealing the Same Materials in the Pending Action	Party in Opposition to Sealing, if any, and Basis
Letter dated March 6, 2024 [ECF No. 295]	Letter references SaveOn SP, LLC's ("SaveOn") marketing strategy and communications with patients, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 2-10.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 1 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 1 is JJHCS's tenth set of RFPs, which reference SaveOn's marketing strategy and communications with patients, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 1.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the interrogatories is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 2 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 2 is an email thread between SaveOn and health plan partners, discussing SaveOn's services and comprising proprietary business	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

	information. <i>See</i> ECF No. 295 at Ex. 2.	be disclosed to competitors and other market participants.			
Exhibit 3 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 3 is an email chain between SaveOn employees and SaveOn's lawyer discussing business strategy for certain health plans, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 3.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 4 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 4 is an email chain between SaveOn employees and Express Scripts discussing the partnership of SaveOn with a health plan and comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 4.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 5 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 5 is an email chain between SaveOn and Express Scripts discussing the services SaveOn offers to health plans, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 5.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection

Exhibit 6 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 6 is a draft letter created by SaveOn for communicating about SaveOn's services to health plans, comprising proprietary business and marketing information. <i>See</i> ECF No. 295 at Ex. 6.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 7 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 7 is a draft letter created by SaveOn and Express Scripts for communicating about SaveOn's services to health plans, comprising proprietary business and marketing information. <i>See</i> ECF No. 295 at Ex. 7.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 8 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 8 is an email chain between SaveOn employees, discussing a compilation of marketing language used by SaveOn, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 8.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 9 to letter dated March 6,	Exhibit 9 is an email chain between SaveOn employees and Express Scripts, discussing a compilation of marketing	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's	No	No objection

2024 [ECF No. 295]	language used by SaveOn, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 9.	non-public business information and strategy be disclosed to competitors and other market participants.	proprietary business information.		
Exhibit 10 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 10 is an email thread between SaveOn and health plan partners, discussing SaveOn's services and comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 10.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 11 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 11 is SaveOn's R&Os to JJHCS's fifth set of interrogatories, containing confidential information about SaveOn's business plan, partners, strategy, and marketing and comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 11.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 12 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 12 is SaveOn's R&Os to JJHCS's tenth set of interrogatories, containing confidential information about SaveOn's business plan, partners, strategy, and	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of	No	No objection

	marketing and comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 12.	be disclosed to competitors and other market participants.	SaveOn's proprietary business information.		
Exhibit 13 to letter dated March 6, 2024 [ECF No. 295]	Exhibit 13 is a letter from counsel for SaveOn to counsel for JJHCS. The letter references SaveOn's relationship with Express Scripts, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 13.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Letter dated March 15, 2024 [ECF No. 295]	Letter references SaveOn's marketing strategy and communications with patients, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 2.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Exhibit 1 to letter dated March 15, 2024 [ECF No. 295]	Exhibit 1 is SaveOn's R&Os to JJHCS's fifth set of interrogatories, containing confidential information about SaveOn's business plans, partners, strategy, and marketing and comprising proprietary	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	Yes, <i>see</i> ECF No. 295 at JJHCS Ex. 11.	No objection

	business information. <i>See</i> ECF No. 295 at Ex. 1.				
Exhibit 2 to letter dated March 15, 2024 [ECF No. 295]	Exhibit 2 is SaveOn's R&Os to JJHCS's first and second set of requests for production, containing confidential information about SaveOn's business plans, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 2.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the R&Os is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection
Letter dated March 19, 2024 [ECF No. 295]	Letter contains a reference to SaveOn's marketing strategy and materials, comprising proprietary business information. <i>See</i> ECF No. 295 at Ex. 2.	If relief is not granted, SaveOn would be at a competitive disadvantage should its proprietary non-public business information and strategy be disclosed to competitors and other market participants.	A redacted, public version of the Letter is being filed. It is believed that no less restrictive alternative is available to prevent the disclosure of SaveOn's proprietary business information.	No	No objection